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Co-Chairmen and Members  
Joint Committee on Environment  
Room 3200, Legislative Office Building  
Hartford, CT 06106

**Re: Governor's H.B. No. 6386, An Act Establishing The Department Of  
Energy And Environmental Protection**

Dear Co-Chairmen and Committee Members:

I have carefully read the proposed bill. I strongly support creation of a Department of Energy but strongly oppose merging of a Department of Energy with the Department of Environmental Protection as contrary to the state's prudent energy, environmental and fiscal policies.

I encourage creation of an independent Department of Energy to oversee and consolidate the alphabet soup of energy policies, plans, and programs provided by the Connecticut Energy Advisory Board ("CEAB"), Energy Efficiency Board ("EEB"), Office of Policy and Management's ("OPM's") Energy Management and Policy Development Unit, Department of Economic and Community Development ("DECD"), Connecticut Innovations ("CI"), Low-Income Energy Advisory Board ("LIEAB"), Connecticut Fuel Oil Conservation Board ("CFOCB"), and Renewable Energy Investment Board ("REIB") into a more effective and efficient organizational structure. For administrative efficiency, the Department of Public Utility Control ("DPUC") and the Connecticut Siting Council ("CSC") would each keep its regulatory function as separate divisions held administratively under a Department. The activities performed by the cited state agencies should be abolished in favor of employed professionals instead of appointed volunteers with special political, economic, energy and environmental interest. Such agencies have not well served the public's interest.

The Connecticut Environmental Policy Act, Connecticut General Statutes, section 22a-1 states that it is in the public interest "to conserve, improve and protect its natural resources and environment and to control air, land and water pollution in order to enhance the health, safety and welfare of the people of the state . . . and to manage the basic resources of air, land and water to the end that the state may fulfill its responsibility as trustee of the environment for the present and future generations."

Section 34 (a) of the bill proposes establishment of a Department of Energy and Environmental Protection under the direction of a commissioner which shall have

jurisdiction over all matters relating to the preservation and protection of the air, water and other natural resources of the state, the equitable distribution and conservation of energy, the regulation of public utilities and the development and administration of a state-wide energy policy. Section 35 provides that the commissioner shall carry out the energy and environmental policies of the state

The permitted activities under the jurisdiction of a Department of Energy causes the unreasonable pollution, impairment or destruction in the air, water and other natural resources held in trust by the state. The environmental protection laws exist solely because of energy consumption. To marry the two agencies into a super agency is analogous to the proverbial "fox asked to guard the hen house." The Governor, spurred by the business community and mindless economic growth, is driving a "Business uber alles" philosophy in proposing the mergers at the expense of the environment.

The Governor has asserted that merging the state's eighty-one (81) agencies into fifty-seven (57) will save an estimated \$10 million dollars, but the governor has not established the statistical error in his estimate. Hence, the savings from the proposed DEEP agency could be miniscule, if any.

"No one is safe in life, liberty or property while the Legislature is in session." Mark Twain.

The Environment Committee should vote against the bill as anathema to the stated public interest set forth in the Connecticut Environmental Policy Act and refer the bill to the Energy and Technology Committee supporting creation of a co-equal Department of Energy.

Very truly yours,



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Robert Fromer  
Environmental Consultant